



FairPoint Communications, Inc.
State of New Hampshire
Docket No. DT 07-011

Respondent: Brian Lippold
Title: Vice President, Business and
Wholesale Services

REQUEST: New England Cable and Telecommunications Association, Inc. and
Comcast Phone of New Hampshire, LLC - Rebuttal

DATED: September 20, 2007

ITEM: NECTA/CPNH - 18R Please provide a copy of the business rules referenced at page 2, line
9. If the business rules have not been developed yet, please so
indicate.

REPLY: **OBJECTION:** FairPoint objects to Data Request 18R on the
grounds that it is overbroad, unduly burdensome, and not reasonably
calculated to lead to the discovery of admissible evidence. FairPoint
also objects on the grounds that data Request 18R seeks highly
confidential and proprietary commercial and strategic information
that would provide competitors a business advantage. NECTA and
CPNH are FairPoint's competitors. The information sought pertains
to the provision of competitive services and includes trade secret
information that required significant effort and cost to produce and/or
confidential, research or commercial information, including
customer, geographic, market and product-specific data. [Objection
served September 25, 2007.]